

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>IN RE:</b>	§	
	§	
<b>GALLERIA 2425 OWNER, LLC,</b>	§	<b>CASE NO. 23-34815</b>
	§	
<b>DEBTOR.</b>	§	

**SONDER’S WITNESS AND EXHIBIT LIST**

[Relates to ECF No. 381]

Sonder USA Inc. (“Sonder”) submits this *Witness and Exhibit List* in connection with the hearing scheduled for **June 4, 2024, at 10:00 a.m.** (the “Hearing”) on the Sonder’s *Emergency Motion for Limited Stay Pending Appeal of the Order Granting Trustee’s Motion for An Order (A) Authorizing the Trustee to Sell the Estate’s Claims Against Sonder USA Inc. and Sonder Canada Inc., (B) Providing that Any Such Sale Will Be Free and Clear of Interests Except for Interests of Contingency Counsel and Defenses, and (C) Granting Related Relief* [ECF No. 381]. The Debtor respectfully designates the following witnesses and exhibits:

**WITNESSES**

1. Any witness designated or called by any other party; and
2. Impeachment or rebuttal witnesses.

**EXHIBITS**

<b>Exhibit No.</b>	<b>Document</b>	<b>Offered</b>	<b>Admitted</b>
1.	Sonder's Proof of Claim (Claim No. 15)		
2.	<i>Chapter 11 Plan of Liquidation of the Debtor by National Bank of Kuwait S.A.K.P., New York Branch</i> (ECF No. 194)		
3.	<i>Trustee's Motion for an Order (A) Authorizing the Trustee to Sell the Estate's Claims Against Sonder USA Inc. and Sonder Canada Inc., (B) Providing That Any Such Sale Will Be Free and Clear of Interests Except for Interests of Contingency Counsel and Defenses, and (C) Granting Related Relief</i> (the "Motion") (ECF No. 210)		
4.	<i>Amended Objection to Claims of National Bank of Kuwait</i> (ECF No. 284)		
5.	<i>Notice of Revised Proposed Order Regarding Sale of Claims Against Sonder</i> (ECF No. 326)		

6.	Audio Recording of 5/15/24 Hearing on the Motion (ECF No. 336)		
7.	<i>Order Granting Motion</i> (ECF No. 337)		
8.	<i>Galleria 2425 Owner LLC and 2425 WL, LLC's Fifth Amended Joint Chapter 11 Plan of Reorganization</i> (ECF No. 377)		
9.	<i>Sonder's Notice of Appeal</i> (ECF No. 387)		
10.	Any and all exhibits properly identified, designated, and admitted by any other party or parties-in-interest; and		
11.	Impeachment or rebuttal exhibits.		

Sonder reserves the right to amend or supplement this Witness and Exhibit List at any time prior to the Hearing.

Date: June 3, 2024  
Houston, Texas

Respectfully submitted,

By: /s/ Brooks M. Wilson

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ATTORNEYS FOR THE DEBTORS

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on the June 3, 2024, a copy of this witness & exhibit list and the exhibits were served on the parties entitled to receive notices through the Court’s electronic notification system.

By: /s/ Brooks M. Wilson  
Brooks M. Wilson